



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 7, 2019

BY ECF

The Honorable Richard J. Sullivan
United States Circuit Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Raheem J. Brennerman*, 17 Cr. 337 (RJS)

Dear Judge Sullivan:

The Government respectfully submits the enclosed restitution order. As the Court is aware, the victim of the offense charged in Counts One and Three of the Indictment, ICBC (London) plc, was defrauded of a principal total of \$5,000,000. With accrued interest, as fixed at a rate defined by ICBC (London) plc's lending agreement with the defendant, as of November 30, 2018, the total loss was \$14,364,967.77. ICBC (London) plc also incurred at least \$900,000 in legal fees attempting to collect the money that the defendant stole from the bank. Accordingly, the proposed restitution order would require the defendant to pay a total of \$15,264,967.77.

Because ICBC (London) plc's losses are the subject of a public lawsuit, and the bank filed its own victim impact statement, the Government is not seeking sealing of the proposed order.

Respectfully submitted,

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